

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In re: Chapter 11

Green Property Management, LLC Case No. 23-71225

Debtor.

I, Desmond D'Souza, duly sworn, depose and say under penalty of perjury and the laws of the United States of America, pursuant to 28 U.S.C. Section 1746 do hereby state as follows:

I am the member of Green Property Management, LLC (the “Debtor”), and as such, I am familiar with the operations, business and financial affairs of the Debtor. I submit this Affidavit in accordance with EDNY Local Bankruptcy Rules in support of the voluntary petition filed by the Debtor of Chapter 11 of Title 11 of the United States Code (“Bankruptcy Code”). The following is the information required by Local Bankruptcy Rule 1007-4:

INFORMATION REQUIRED BY LOCAL BANKRUPTCY RULE 1007-4

Local Rule 1007-4(a)(i)

1. The Debtor is a small business within the meaning of Bankruptcy Code Section 101(51D) and has elected to file this Chapter 11 under Subchapter V.

Local Rule 1007-4(a)(ii)

2. The Debtor is not a single asset real estate debtor within the meaning of Bankruptcy Code Section 101(51B)

Local Rule 1007-4(a)(iii)

3. The Debtor owns and rents a commercial multi-family real property located at 203 Harvard Street, Hempstead, New York 11550 (the “Real Property”). The Debtor is filing a voluntary petition under Chapter 11 of the Bankruptcy Code due to a pending foreclosure sale creditor of the Real Property. The foreclosure sale was initiated by Nationstar Mortgage, LLC.

Local Rule 1007-4(a)(iv)

4. This case was not originally commenced under Chapter 7 or Chapter 13 of Title 11 Of the United States Code. There is no pending bankruptcy case against the Debtor and this petition is filed as a voluntary Chapter 11 proceeding under Subchapter V.

Local Rule 1007-4(a)(v)

5. Not applicable

Local Rule 1007-4(a)(vi)

6. A list containing the names and addresses of the Debtor's twenty (20) largest unsecured creditors, excluding insiders was filed along with the Petition.

Local Rule 1007-4(a)(vii)

7. A list containing the names and addresses of the Debtor's five (5) largest secured claims was filed along with the Petition.

Local Rule 1007-4(a)(viii)

8. The Debtor's main asset is the Real Property and the main liability is a lien against the Real Property from Nationstar Mortgage LLC. The Debtor disputes the lien from Nationstar and believes that under New York law the mortgage should be cancelled and discharged as of record.

Local Rule 1007-4(a)(ix)

9. The Debtor has no publicly traded stock or other securities.

Local Rule 1007-4(a)(x)

10. To the best of Debtor's knowledge, none of their property is in the possession of any custodian, public officer, mortgagee, pledge, or secured creditor, or any agent for such entity. The mortgage on the Property contains an assignment of rent provision.

Local Rule 1007-4(a)(xi)

11. 203 Harvard Street, Hempstead, New York. This is the Property the Debtor owns and operates as a landlord.

Local Rule 1007-4(a)(xii)

12. The Debtor's main asset is real property located at 203 Harvard Street, Hempstead, New York, and its books and records are located at 803 Bellmore Avenue East Meadow, NY 11554. There are no assets held outside the United States.

Local Rule 1007-4(a)(xiii)

13. The following actions or proceedings are pending concerning the Debtor:

A. NATIONSTAR MORTGAGE LLC,

v.

VALERI WORRELL; CARLTON NEELY; GREEN PROPERTY MANAGEMENT, LLC; STATE OF NEW YORK; PEOPLE OF THE STATE OF NEW YORK; OMAR TOPEY; ELISA FLORES; WINFIELD MARCIA; MICHAEL GRANT; CHARLET GRANT; SHERRY LOUIS; EDILIA GUZMAN; ALEX RIVERA

Index No. 010782/2015

Pending in the Supreme Court of New York, County of Nassau

B. Green Property Management, LLC and all other Petitioners Set Forth on the Attached Schedules

v.

The Assessor and The Assignment Review Commission of the County of Nassau

Index No. 402504/2019

Pending in the Supreme Court of New York, County of Nassau

C. Green Property Management, LLC and all other Petitioners Set Forth on the Attached Schedules

v.

The Assessor and The Assignment Review Commission of the County of Nassau

Index No. 401473/2020

Pending in the Supreme Court of New York, County of Nassau

D. Green Property Management, LLC and all other Petitioners Set Forth on the Attached Schedules

v.

The Assessor and The Assignment Review Commission of the County of Nassau

Index No. 401359/2021

Pending in the Supreme Court of New York, County of Nassau

E. Green Property Management, LLC and all other Petitioners Set Forth on the Attached Schedules

v.

The Assessor and The Assignment Review Commission of the County of Nassau
Index No. 401980/2022

Pending in the Supreme Court of New York, County of Nassau

Local Rule 1007-4(a)(xiv)

14. The Debtor's senior management consists of Desmond D'Souza who has been with the Debtor since its inception in 2014.

Local Rule 1007-4(a)(xv)

15. The Debtor employs E.H. Contracting, Inc. E.H. Contracting is paid \$400 per month for the maintenance on the Real Property.

Local Rule 1007-4(a)(xvi)

16. \$0. The Debtor's principals do not take any salary from the business.

Local Rule 1007-4(a)(xvii)

17. Estimated monthly cash receipts \$6,025

Estimates monthly expenses:

Mortgage: \$ (Unknown)(Disputed)
Property Taxes: \$842
Utilities: \$120
Repairs and Maintenance: \$400
Insurance \$300

Local Rule 1007-4(a)(xviii)

18. The Debtor has Rental Dwelling Policy on the Real Property with State Farm.

Local Rule 1007-4(a)(xix)

19. Checking Account in the name of Bethpage Federal Credit Union in the name of Green Property Management LLC

Local Rule 1007-4(a)(xx)

20. There is currently an Order to Show Cause before the Nassau County Supreme Court in the case Nationstar Mortgage, LLC v. Valeria Worrell, et al., 010782/2015, (1) to cancel the Court's prior orders granting summary judgment, (2) vacate the judgment of foreclosure and sale, (3) dismiss the foreclosure Complaint, and cancel and discharge the mortgage as of record.



Desmond D'Souza
Member of Green Property Management, LLC